

**Lewis P. Adams (#7123)**  
**Attorney at Law**  
**9231-A South Redwood Road**  
**West Jordan, Utah 84088**  
**(801) 676-1950**  
**Attorney for Debtor**

---

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

---

In re	)	CHAPTER 13
	)	
TRACIE ESQUIVEL,	)	No. 10-30088
	)	
Debtor	)	Judge William T. Thurman

---

**OBJECTION TO CLAIM 24, FILED BY BASS & ASSOCIATES P.C. ON BEHALF OF  
HSBC BANK NEVADA, N.A.**

---

Debtor, through counsel undersigned, hereby objects to Claim 24, filed by Bass & Associates P.C. on behalf of HSBC Bank Nevada, N.A. Debtor alleges as follows:

1. Claim 24 was filed by Bass & Associates P.C. on behalf of HSBC Bank Nevada, N.A. on October 11, 2010 and alleges a secured claim in the amount of \$3,698.82.
2. Debtor agrees that she has an account with HSBC, but it is not for the collateral attached to Claim 24. The 2001 Yamaha Wave Runner listed as the collateral attached to Claim 24 was sold in 2006. The title attached to the Claim appears to be the title for the collateral listed, but the title does not show the debtor listed as the owner, nor does the title list HSBC as lienholder.

3. Debtor has no collateral that is currently pledged as security for the obligation to HSBC. The debtor objects to the claim as filed. Claim 24 should be disallowed as filed and should be paid as an unsecured nonpriority claim in the amount of \$3,698.82.

**WHEREFORE**, Debtor requests that Claim 24, filed by Bass & Associates P.C. on behalf of HSBC Bank Nevada, N.A. be disallowed as filed and paid as an unsecured nonpriority claim in the amount of \$3,698.82. Debtor requests such other and further relief as this Court deems appropriate under the circumstances.

Dated this 28<sup>th</sup> day of December, 2010.

/s/ Lewis P. Adams

Lewis P. Adams  
Attorney for Debtor.

**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing Claim Objection was served by ECF (as noted below), or addressed to the following persons, deposited in the U.S. Mail, first class, postage fully pre-paid on the 28<sup>th</sup> day of December 2010 to the following:

Kevin R. Anderson, Esq.  
Chapter 13 Trustee  
ECF Notification

HSBC Bank Nevada, N.A.  
c/o Bass & Associates, P.C.  
3936 E. Ft. Lowell, Suite 200  
Tucson, AZ 85712

/s/ Lewis P. Adams